

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

245039

OLIN CORPORATION,

Plaintiff,

v.

FISONS PLC, NOR-AM CHEMICAL
COMPANY, AMERICAN BILTRITE,
INC., THE BILTRITE
CORPORATION, and JOHN DOES

Defendants,

and

NOR-AM CHEMICAL COMPANY,

Defendant/
Third-Party
Plaintiff,

v.

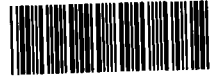
FISONS FINANCE LIMITED
THE BOOTS COMPANY, PLC and
THE STEPAN COMPANY,

Third-Party
Defendants.

CIVIL ACTION NO. 93-11166WF

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245039



NOR-AM CHEMICAL COMPANY'S DESCRIPTION OF DOCUMENTS RELEVANT TO
DISPUTED FACTS SUBMITTED PURSUANT TO LOCAL RULE 26.2 AND FEDERAL
RULE OF CIVIL PROCEDURE 26(a)

Kenneth J. Warren
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Marc L. Frohman
Attorneys for Defendant
NOR-AM Chemical Company

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DOCUMENTS WHICH MAY BE RELEVANT TO DISPUTED FACTS

DATE	DESCRIPTION	LOCATION
8/19/66 - 12/9/66	Fisons Corporation (Maine) Minute Book	NOR-AM Chemical Co., Wilmington, DE
12/1/66 - 4/11/69	Fisons Corporation (Mass.) Minute Book	NOR-AM Chemical Co., Wilmington, DE
6/3/69 - 3/21/73	Fisons Corporation (Mass.) Minute Book	NOR-AM Chemical Co., Wilmington, DE
5/17/73 - 3/19/75	Fisons Corporation (Mass.) Minute Book (Name changed to Fisons Incorporated 1973)	NOR-AM Chemical Co., Wilmington, DE
5/22/75 - 5/18/78	Fisons Incorporated Minute Book	NOR-AM Chemical Co., Wilmington, DE
12/7/78 - 2/16/81	Fisons Incorporated Minute Book	NOR-AM Chemical Co., Wilmington, DE
12/31/80	Fisons Incorporated Financial Statements	NOR-AM Chemical Co., Wilmington, DE
8/19/66	Fisons Incorporated By-Laws	NOR-AM Chemical Co., Wilmington, DE
7/18/69	Minutes of Fisons Corporation Regular Meeting of the Board of Directors	Manko, Gold & Katcher
12/5/69	Minutes of Fisons Corporation Special Meeting of the Board of Directors	Manko, Gold & Katcher
4/21/70	Minutes of Fisons Corporation Special Meeting of the Board of Directors	Manko, Gold & Katcher
8/21/70	Minutes of Fisons Corporation Special Meeting of the Board of Directors	Manko, Gold & Katcher
11/24/71	Minutes of Fisons Corporation Special Meeting of the Board of Directors	Manko, Gold & Katcher
8/20/72	Minutes of Fisons Corporation Annual Meeting of the Board of Directors	Manko, Gold & Katcher
1/24/73	Minutes of Fisons Corporation Special Meeting of the Board of Directors	Manko, Gold & Katcher
7/18/73	Minutes of Fisons Corporation Special Meeting of Stockholders (Name change to Fisons Incorporated)	Manko, Gold & Katcher
7/26/73	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
8/12/73	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
10/19/73	Minutes of Fisons Incorporated Special Meeting in Lieu of the Annual Meeting of the Stockholders	Manko, Gold & Katcher
3/20/74	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher

5/15/74	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
7/26/74	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
11/20/74	Minutes of Fisons Incorporated Annual Meeting of the Board of Directors	Manko, Gold & Katcher
3/19/75	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
7/24/75	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
9/24/75	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
11/18/75	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
1/21/76	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
5/26/76	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
7/20/76	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
11/9/76	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
9/22/77	Minutes of Fisons Incorporated Special Meeting in lieu of the Annual Meeting of the Board of Directors	Manko, Gold & Katcher
3/16/78	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
5/18/78	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
5/17/79	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
4/24/80	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
7/21/80	Minutes of Fisons Incorporated Special Meeting of the Board of Directors	Manko, Gold & Katcher
1/1/81	Agreement of Merger of FBC Chemicals, Inc. (DE) and Fisons Incorporated (MA) and Affidavits	Manko, Gold & Katcher
2/16/81	Minutes of Fisons Incorporated Meeting of the Board of Directors and Resolutions Adopted	Manko, Gold & Katcher

1983	Sales Agreement Between Boots plc, Fisons plc, Fisons Finance Ltd., Schering AK, Schering Holdings and FBC for Sale and Purchase of Issued Share Capital of FBC Holdings Ltd.	Manko, Gold & Katcher
6/8/93	Assignment between Schering Ltd. and Nor-Am	Manko, Gold & Katcher

INSURANCE POLICIES		
POLICY NUMBER	CARRIER	LOCATION OF POLICY
SASAG625	Ace Insurance Co.	Johnson & Higgins*
01 XN 4743WCA	Aetna C & S	Johnson & Higgins
AXL5206707	Allianz Insurance	Johnson & Higgins
AXL5206716	Allianz Insurance	Johnson & Higgins
AXL5206743	Allianz Insurance	Johnson & Higgins
AXL5206752	Allianz Insurance	Johnson & Higgins
AXL5206763	Allianz Insurance	Johnson & Higgins
AXL5206770	Allianz Insurance	Johnson & Higgins
AXL5206785	Allianz Insurance	Johnson & Higgins
SE400997	Colonia Insurance	Johnson & Higgins
SE401648	Colonia Insurance	Johnson & Higgins
SE401914	Colonia Insurance	Johnson & Higgins
SE401940	Colonia Insurance	Johnson & Higgins
SE405007	Colonia Insurance	Johnson & Higgins
SE405044	Colonia Insurance	Johnson & Higgins
SE405044	Colonia Insurance Company	Johnson & Higgins
2482980	Continental Casualty Co.	Unknown
EU000612	First State	Johnson & Higgins
4-000-524	Gerling America Insurance Co.	Johnson & Higgins
4-000-573	Gerling America Insurance Co.	Johnson & Higgins
4-000-696	Gerling America Insurance Co.	Johnson & Higgins
4-000-853	Gerling America Insurance Co.	Johnson & Higgins
13ABJH5498	Hartford	Johnson & Higgins
(CN) XCP156506	INA (now CIGNA)	Johnson & Higgins
ISL G 031305-2	INA (now CIGNA)	Johnson & Higgins
XPL043855	INA (now CIGNA)	Johnson & Higgins
ISL 60687437-A	INA/Gerling	Johnson & Higgins
GL 1436938	National Union	Johnson & Higgins

GL 3258501	National Union	Johnson & Higgins
GL 4609407	National Union	Johnson & Higgins
GL 4609408	National Union	Johnson & Higgins
GL 4609420	National Union	Johnson & Higgins
RMGLA 2495592	National Union	Johnson & Higgins
RMGLA 2495772	National Union	Johnson & Higgins
RMGLA 4596095	National Union	Johnson & Higgins
1229901	National Union/AIAC	Johnson & Higgins
9603257	National Union/AIAC	Johnson & Higgins
9605683	National Union/AIAC	Johnson & Higgins
GLA 1977657	National Union/AIAC	Johnson & Higgins
G225RYB	XL Insurance Co.	Johnson & Higgins

* Johnson & Higgins is NOR-AM's current insurance broker and has been since 1981. Their office is in Parsippany, NJ.

DOCUMENTS SUBJECT TO ATTORNEY-CLIENT/WORK PRODUCT PRIVILEGE

DATE	DESCRIPTION	LOCATION
8/10/93	Interoffice Memorandum from David George to Dr. Smith re: Chromium Used for AC Manufacture	Manko, Gold & Katcher
8/11/93	Interoffice Memorandum from David George to Dr. Smith re: Chromium Used for AC Manufacture	Manko, Gold & Katcher
8/13/93	Interoffice Memorandum from David George to Dr. Smith re: Chromium Used for AC Manufacture/Replacement by 'Chlorate' Process	Manko, Gold & Katcher
8/16/93	Memorandum from MA Smith to Kenneth Morris re: Production of Kempore at NPI	Manko, Gold & Katcher
11/12/93	Letter from Kenneth Morris to Kermit Rader re: 11/1/93 Meeting with Dr. Smith	Manko, Gold & Katcher
8/6/93	Minutes of Interview of Michael Smith	Manko, Gold & Katcher
8/17/93	Minutes of Interview of Terry James	Manko, Gold & Katcher
8/24/93	Minutes of Interview of Leo Eakins	Manko, Gold & Katcher
10/5/93	Minutes of Interview of David Henshaw	Manko, Gold & Katcher
10/13/93	Minutes of Interview of Chris Cronin	Manko, Gold & Katcher
10/14/93	Minutes of Interview of Keith Story	Manko, Gold & Katcher
10/20/93	Minutes of Interview of David Kenworthy	Manko, Gold & Katcher
Undated	Charts of Fisons Corp. Directors and Officers	Manko, Gold & Katcher

CERTIFICATE OF SERVICE

Marc L. Frohman hereby certifies that on the date set forth below he caused a true and correct copy of NOR-AM Chemical Company's Description of Documents Relevant to Disputed Facts Submitted Pursuant to Local Rule 26.2 and Federal Rule of Civil Procedure 26(a) to be served by first class mail, postage prepaid as follows:

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(by Overnight Delivery)



Marc L. Frohman

Dated: January 25, 1994